



LG&E Energy LLC
220 West Main Street (40202)
P.O. Box 32030
Louisville, Kentucky 40232

November 14, 2005

RECEIVED

NOV 14 2005

PUBLIC SERVICE
COMMISSION

Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

**Re: ENRIQUE ESPINOSA COMPLAINANT V. LOUISVILLE GAS AND
ELECTRIC COMPANY DEFENDANT - CASE NO. 2005-00398**

Dear Ms. O'Donnell:

Louisville Gas and Electric Company files herewith the original and four copies of its Response to the Interrogatories and Requests for Production of Documents of Enrique Espinosa dated November 7, 2005 in the above-cited case.

A copy is being mailed to the Complainant.

If you have any questions regarding this filing, please contact me at (502) 627-4110.

Very truly yours,

John Wolfram
Manager, Regulatory Affairs

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

| | | |
|--------------------------------------------|---|-------------------|
| ENRIQUE ESPINOSA |) | |
| |) | |
| COMPLAINANT |) | |
| |) | CASE NO. |
| v. |) | 2005-00398 |
| |) | |
| LOUISVILLE GAS AND ELECTRIC COMPANY |) | |
| |) | RECEIVED |
| DEFENDANT |) | |

NOV 14 2005
PUBLIC SERVICE
COMMISSION

**RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
TO THE INTERROGATORIES AND REQUESTS
FOR PRODUCTION OF DOCUMENTS
OF ENRIQUE ESPINOSA
DATED NOVEMBER 7, 2005**

FILED: NOVEMBER 22, 2005

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2005-00398

**Response to the Interrogatories and Requests
for Production of Documents of Enrique Espinosa
Dated 11/7/05**

Question No. 1

Responding Witness: Butch Cockerill

- Q-1. In spite of an earlier LG&E statement that my home meter glass was painted (Commission, 4-4-05), on 10-17-05, 3. d., LG&E claims: "it is possible that the problem may have resulted from moisture under the meter glass, rather than the presence of any paint". It is common knowledge that moisture or water causes metal corrosion and growth of bacteria, molds and mildew. As a matter of fact, on October 22, 2005, LG&E instructed me to remove the corrosion of my meter pipes and protect them with paint (Enclosure 1). In view of all of this, please provide a response and documentation for the following:
- a. Was the meter at 6104 Orion Road and its index checked for corrosion, dirt, bacteria, and mold and mildew growths? Notice that all these agents may affect the proper function of the meter index to reset to 0000 without showing noticeable physical damage.
 - b. Was the meter index checked for resetting to 0000 when it was checked as indicated on 10-17-05, 3. 1.?
 - c. Was the meter index cleaned or treated in any manner?
 - d. How long has moisture been a problem for this meter?
 - e. How old is this meter?
 - f. Is this meter in excess of mechanical limits?
 - g. Is this meter in need for replacement?
- A-1. a. When the glass over a meter index is changed, it is standard procedure for the technician to check the index on the meter for any damage and for mold or mildew growth on the index face. If found, the index face plate is cleaned before the new glass is installed. In this case, however, the field personnel reported no evidence of any damage to the meter or to the index itself, and there is no documentation of any mold, mildew or corrosion on the meter

index.

Regarding the October 22, 2005 letter, this is a standard form letter that is mailed to customers when LG&E representatives inspect and find rust or corrosion on the gas piping. This letter only refers to the piping and in no way refers to the meter index.

Furthermore, LG&E has no knowledge of any reported meter jumps with this type of meter due to moisture on the glass over the index. Finally, it should be noted that a meter does not reset, but reflects cumulative usage.

- b. See response to 1-a
- c. See response to 1-a.
- d. The glass over the meter index was replaced on two occasions – March and September, 2005. Moisture on the glass over a gas meter's index is not unusual, because the index glass has weep holes in the bottom to allow the escape of moisture that may collect inside the glass. However, while moisture on the glass over the meter index may affect the ability of a meter reader to take a reading, it will not affect the performance of the gas meter or the index itself.
- e. This meter was purchased on August 13, 1996 and installed at 6104 Orion Road on January 15, 1997.
- f. No. The Kentucky Public Service Commission allows a residential class gas meter (up to and including 500CFH rated capacity) to remain in service for 35 years. See Response to PSC-2(d).
- g. No.

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2005-00398

**Response to the Interrogatories and Requests
for Production of Documents of Enrique Espinosa
Dated 11/7/05**

Question No. 2

Responding Witness: Butch Cockerill

- Q-2. On 10-17-05, First Affirmative Defense, LG&E states: "An LG&E representative replaced the glass on the meter on March 31, 2005. On that day, the gas meter was read as "1248". The glass was changed out again on September 30, 2005, due to the presence of moisture under the glass".
- a. Please provide records of the glass replacements, the clarity of these glasses and the record indicating the gas meter reading as "1248" on March 31.
- A-2. a. Please see Response to PSC 6(b). The glass over the meter index was replaced on March 31 and September 30, 2005 due to the presence of moisture on the glass over the meter index. There is no record of the clarity of these glasses at the time of replacement. On March 31, 2005, the meter was read as "1248." A copy of the screen print for the March 31st glass change is attached hereto.

NOU-11-2005 10:14

IG&E GAS METER

GSMSD1Q4 SERVICE WORK REPORT - INQUIRE 11/11/05
10:01:15
W/O # 612070 WORK TYPE PCU CREW ID 480 ASSIGNED 2005-03-31 05.42.17
LEAK GRADE FED LAND SYSTEM OCCURRED ON PART CAUSE
STOPBOX OPERABLE
TEST PRESSURE: COMPANY SERV UNIT CUSTOMER SERV UNIT
HOUSE LINE UNIT
COAT COND EXT PIT DEPTH DIA INT PIT DEPTH DIA
MV PART
MV PART ANODE(S) INSTALLED: COMPANY - #
CUSTOMER - #
OF CUTS CUT TYPE CUT SIZE X
GAS LEFT 1 WORK PRFRMD ISV EST STATUS EST
DATE 2005-03-31 ARRIVED 11 45.00 DEPARTED 12.00.00
GAS OFF GAS ON MAN HOURS HH MM 15
COMPLETED Y WEATHER I EMPLOYEE ID 0070 - Name Not Found
REMARKS CHANGED GLASS. MTR#532871X1248

SURVEILLANCE REPORT SCREEN 1 OF 1
WORK REPORT DISPLAYED
PF1-HELP PF3-EXIT PF4-MAIN PF13-CUST RPTS PF14-WO PF15-WO ASSIGN

| | | | | | |
|--------------------------------------|-----------------------------------------|-------------------------------|------------------------------|------------------------------|------------------|
| Meter: 532871 | | Transaction Date: 01/15/1997 | | Stix Code: 1 INSTALLED | |
| ERT: | | ERT Stix Code: | | ERT Install Date: 00/00/0000 | |
| Prev ERT: | | | | | |
| Service Information | | | | | |
| District: 10 | Route: 066 | Premise: 5000243061 | IC: 001 | Master Meter: No | |
| Street No: 6104 | Street: DRION RD | Apt: | | Lot: | |
| City: LOUISVILLE | State: KY | Zip: 40222 | | | |
| Location: L SIDE YARD | Seal No: 9999 | | Seal OK: Yes | Seal OK Date: 01/01/1900 | Double Index: No |
| Installation and Removal | | | | | |
| Installer: 040 3379 | Tran Code: MC | Pending No: | Service/Rate: 8 12 | | |
| Install Reading: 0000 | Tax District: 30 | Status: | Reason: | | |
| Removal Reading: | Stop Box: | Families: | Reason Removed: STF | | |
| Regulator Information | | | | | |
| Regulator: Yes | Bypass: | Meter Pressure (lbs. oz): .04 | | | |
| Date Regulator Installed: 01/01/0001 | Regulator Last Checked Date: 01/15/1997 | | | | |
| Dept: | Emp: | Dept: Emp: | | | |
| Regulator Serial Number: | Manufacturer: | | Regulator For Pressure Type: | | |
| Regulator Location: | Model: | | Orifice Size: | | |
| Internal Relief: | Passed Lock-up Test: | | Vent Tubing Size: .00 | | |
| Change Reason: | | | Relief Vent Clear: | | |
| Updated by: LGE4899 on: 01/16/1997 | | | | | |

| | | | |
|--------------------|-------------------------------|-------------------------|---------------------|
| Co. Number: | 532871 Mig. Number 532871 | Last Install Year: 1986 | Location: |
| Reason: | NEW METER TEST | Strk Code: I | INSTALLED |
| Check & Test Date: | 01/01/1900 | Prover: | |
| Size Code: | 015 AL425 00425 | Test Code: | XXX NOT ASSIGNED |
| Stuck/Fail/Notest: | Open Proof: 000 | Check Proof: | 000 Over 2% Fast: N |
| Average As Found: | 0 | Junk: | No |
| In Test Comments: | Retire Code: 000 NOT ASSIGNED | | |
| Check & Test Date: | 10/05/1996 | Prover: | 043 |
| Out Reading: | 000000 | Out Proof: | 043 |
| Average As Left: | -0.400 | Open Proof: | 043 |
| Repair Code: | A | OK METER | |
| Out Test Comments: | Repairman: 043 0000 | | |
| Leak Test: | Yes | HI/Low Test: | Yes |

Updated By: GMDAS on: 10/05/1996

LOUISVILLE GAS AND ELECTRIC COMPANY

CASE NO. 2005-00398

**Response to the Interrogatories and Requests
for Production of Documents of Enrique Espinosa
Dated 11/7/05**

Question No. 3

Responding Witness: Butch Cockerill

- Q-3. In view that LG&E documentation shows actual readings of 9795 February 15, 05, and 1152 March 16 on the meter with the same unreplaced glass (LG&E cites glass replacements only on March 31 and September 30), explain:
- a. Why LG&E appears to this date unwilling to accept the actual reading of 9795 February 15, but accepts the actual reading of 1152 March 16, both readings obtained thru the same meter glass?
- A-3. a. Please see LG&E's response to PSC Item 3.